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13 UNITED STATES DISTRICT COURT

14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 **LISAMARIA MARTINEZ,**  
16 Plaintiff,  
17 v.

18 **COUNTY OF ALAMEDA,**  
19 Defendant.

20 Case No. 3:20-cv-06570-TSH

21 **DECLARATION OF TIMOTHY**  
22 **ELDER IN SUPPORT OF**  
23 **OPPOSITION TO RENEWED**  
24 **MOTION FOR JUDGMENT AS A**  
25 **MATTER OF LAW OR, IN THE**  
26 **ALTERNATIVE, FOR NEW TRIAL**  
27  
28

**DECLARATION OF TIMOTHY ELDER**

I, Timothy Elder, declare:

1. I am an attorney admitted to practice in California and a counsel of record for Plaintiff Lisamaria Martinez. This declaration is based on my personal knowledge. I am competent to testify on the matters stated and declare that these items are true and accurate to the best of my knowledge and belief.

2. Attached as **Exhibit A** is a true and correct copy of relevant excerpts of Trial Transcript, Volume 3, Testimony of Matt Yankee.

3. Attached as **Exhibit B** is a true and correct copy of relevant excerpts of Trial Transcript, Volume 4, Testimony of Lisamaria Martinez.

4. Attached as **Exhibit C** is a true and correct copy of Exhibit 4C admitted into evidence at trial, an audio recording of Plaintiff's first interaction with Laura Briones on the day of the incident.

5. Attached as **Exhibit D** is a true and correct copy of relevant excerpts of Trial Transcript, Volume 3, Testimony of Steven Clark.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 10, 2025

/s/ Timothy Elder  
Timothy Elder